

**POSTERNOCK APELL, PC**

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 Diana R. Sever, Esquire (031111994)  
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 Attorneys for Defendants, Jackson School District, Geoffrey Brignola,  
 Debra Phillips and Adrien Jean-Denis

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEW JERSEY

ZIA SHAIKH,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.: 3:22-cv-2053-ZNQ-TJB
	:	
Laura L. Germadnig, Siegfried Germadnig	:	
Patricia Germadnig Melissa Reeves Kenneth	:	
Reeves Mark Germadnig Stacy	:	
GERMADNIG Siegfried GERMADNIG Jr	:	
Barus Germadnig Crystal Germadnig Skye	:	
Germadnig Jr David Tarnowski Nicole	:	
Tarnowski · Slava Kleyman Nancy	:	
Cavanaugh Louis Elwell Janice Elwell	:	
Christine Gilfillen Sandra Seaman Jack M	:	
Nada Pityinger Brett Pityinger Daniel	:	
SCHASTNY Kathleen SCHASTNY Bradley	:	
Mckee Rene McKee Robert McKee Carol	:	
Mckee Stanley O'Brian Lori O' Brian Candy	:	
Mckee Page 1 of 66 Steven A. Zabarsky,	:	
Esq., Kimberly Zabarsky, Law firm of Citta,	:	
Holzapfel & Zabarsky, Legal Malpractice	:	
Insurance Carrier for Citta, Holzapfel &	:	
Zabarsky, Cathleen Christie-Coneeny, Esq.,	:	
Legal Malpractice Insurance Carrier For	:	
Cathleen Christie-Coneeny, Esq., Joseph	:	
Gunteski CPA Cowan Gunteski & Co John	:	
R. Wiley Jr, CPA,ABV,CGMA AICPA	:	
(Association of International CPA's) Seth	:	
Arkush, Integrated Care Concepts LLC	:	
Jackson School District Principal of Jackson	:	
Liberty HS Principal of Christa McAuliffe	:	
Middle School Principal of Crawford	:	

**DEFENDANTS' NOTICE OF CROSS  
 MOTION FOR A PROTECTIVE  
 ORDER PURSUANT TO FED. R. CIV.  
 P. 45 AND IN OPPOSITION TO  
 PLAINTIFF'S NOTICE OF MOTION  
 (IMPROPERLY CAPTIONED  
 "ORDER TO SHOW CAUSE").**

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Rodriguez elementary School Stephanie J. :  
Brown Esq August. Landis Esq Margie :  
McMahon Esq David Schlendorf Esq :  
Jackson Twp. Police Chief Matthew KUNZ :  
Jackson Township Police Officer :  
Christopher Parise Ocean County NJ :  
Prosecutor Bradley Bilheimer John Foti Jr :  
Madeline F. Einbinder J.S.C Marlene L. Ford :  
A.J.S.C John S. Doran J.S.C. Deborah H. :  
Schron J.S.C. John Does 1-10, John Does 1- :  
10, XYZ Corporations, :  
: :  
Defendants. :

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TO:

Plaintiff Zia Shaik, Pro Se 200 Village Ctr Dr., Unit 7381 Freehold, NJ 07728	Mark H. Zitomer, Esquire Schneck, Price, Smith & King, LLP 220 Park Avenue, PO Box 991 Florham Park, NJ 07932 Counsel for Jackson Twp Solicitor
Michael P. Chipko, Esquire Wilson, Elser, Moskowitz, Edelman & Dicker, LLP 200 Campus Drive Florham Park, NJ 07932 Counsel for Steven A. Zabarsky, Kimberly Zabarsky and the law firm of Citta, Holzapfel & Zabarsky	David J. Montag, Esquire Milber, Makris Plousadis & Seiden, LLP 75 Livingston Avenue, Suite 103 Roseland, NJ 07068 Counsel for Defendant Margie McMahon
Michael S. Nagurka, Esquire Rothstein, Mandell, Strohm, Halm & Cipriani, P.A. 98 East Water Street Toms River, NJ 08753 Counsel for Chief of Police Matthew Kunz and Jackson Township Police Officer Christopher Parise	Kyle L. Wu, Esquire Margolis Edelstein The Curtis Center 170 S. Independence Mall W., Suite 400E Philadelphia, PA 19106 Counsel for Defendants Joseph Guteski, CPA and Cowan Guteski & Co.
Melissa J. Brown, Esquire Marks, O'Neill, O'Brien, Doherty & Kelly, P.C. Cherry Tree Corporate Center 535 Route 38 E, Suite 504 Cherry Hill, NJ 08002 Counsel for Seth Arkush	

PLEASE TAKE NOTICE that on March 20, 2023 or on such date as the Court shall schedule same, the undersigned Diana R. Sever, Esquire attorney for Defendants Jackson Township School District, Geoffrey Brignola, Debra Phillips, and Adrien Jean-Denis shall Cross-Move before the Honorable Georgette Castner, United States District Judge in the United States Court House, Trenton, New Jersey pursuant to Federal Rule of Civil Procedure 45 for an Order Denying Plaintiff's Notice of Motion (improperly captioned "Order to Show Cause") to Hold Defendants in Contempt for failing to comply with Plaintiff's January 31, 2023 Subpoena which is at present the subject of a timely filed Motion to Quash; and for a Protective Order barring Plaintiff from issuing any further Subpoenas for information which is the subject of the two Pending Motions to Quash.

In support of this Cross Motion, the undersigned shall rely upon the Certification of Counsel and Letter Brief accompanying this submission.

The undersigned requests oral argument only if this motion is opposed and the Court permits.

A proposed form of Order is attached.

POSTERNOCK APELL, PC

By: *Diana R. Sever*  
Diana R. Sever, Esquire  
Attorney for Defendants Jackson Township  
School District, Geoffrey Brignola, Debra  
Phillips, and Adrien Jean-Denis

February 23, 2023